

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. G-18-24

JOHN DAVID KNOWLTON

MOTION TO MODIFY CONDITIONS OF RELEASE

The defendant, John David Knowlton, files this motion to modify the conditions of his pretrial release to permit him to have dinner out with his wife and three adult friends on Sunday, May 28, 2019 from 4pm to 8pm:

On December 20, 2018, Mr. Knowlton was arrested pursuant to an indictment charging him with receipt and possession of child pornography. That same day, he was released pursuant to conditions of release. Among those conditions is home detention, which limits Mr. Knowlton to his home except for employment, medical, legal, and similar reasons.

Mr. Knowlton requests authorization to be away from his house from 4pm to 8pm on Sunday, May 28, 2019, so that he, his wife, and three adult friends can celebrate his wife's birthday (which is this week) and the couple's anniversary (which was earlier this month). Specifically, if granted permission, Mr. Knowlton and the others would dine at Carrabba's, on Bay Area Boulevard in Webster, Texas.

The requested 4-hour window would allow Mr. Knowlton sufficient time for travel and dining, and then to return home before dark.

Mr. Knowlton leaves home regularly for work and other reasons, as permitted by the Court's order, and has given no indication of flight or of posing any danger to the community. This additional, brief absence from his home will pose no greater problem.

Mr. Knowlton has been subject to conditions of release since December without incident. The assigned probation officer, Andrew Adame, has confirmed Mr. Knowlton's compliance, and also indicated that he does not oppose this request.

Assistant United States Attorney Zahra Fenelon has informed defense counsel that the government takes no position regarding this motion.

Respectfully submitted,

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By /s/ Philip G. Gallagher
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CERTIFICATE OF SERVICE

I certify that on May 22, 2019, a copy of the foregoing motion was served by notice of electronic filing upon all parties of record and US Probation Officer Andrew Adame.

/s/ Philip G. Gallagher
PHILIP G. GALLAGHER